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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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AUG 17 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Tariffs Implementing Access Charge Reform

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CC Docket No. 97-250

MCI OPPOSITION

MCI Telecommunications Corporation (MCI) hereby submits its opposition to the Motion of SBC Communications Inc. for Extension of Time, filed in the above-captioned docket on August 6, 1998. SBC requests that the Commission grant SBC a two-month extension, from August 31, 1998 to October 29, 1998, for filing the refund plan required by the Access Reform Tariff Order. SBC contends that all parties would be served by delaying the filing date for the refund plan because Commission action on SBC's petition for reconsideration of the Access Reform Tariff Order may negate the need for the refund plan.

MCI respectfully requests that the Commission deny SBC's motion. As an initial matter, it is highly unlikely that the Commission will grant SBC's petition for reconsideration. As MCI demonstrated in its opposition to SBC's petition for reconsideration, the Commission correctly found that SBC's non-primary line definition

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was patently unreasonable.¹ By using a definition that allowed multiple lines with the same billing name and address to be classified as primary, and applying this definition to a LEC whose practice was to assign most additional lines to separate accounts, SBC effectively nullified the Access Reform Order's primary/nonprimary line distinction.

The likely impact of the relief sought by SBC would be to delay payment of the refund required by the Access Reform Tariff Order. If SBC were to file its refund plan on October 29, 1998, and the Commission were to then allow time for interested parties and Commission staff to review the refund plan and for the Commission to prepare an order, it is likely that refunds will be delayed until the end of 1998 -- almost a year after IXCs began paying the rates found unlawful by the Access Reform Tariff Order.

The impact of this delay on SBC's customers outweighs the minimal cost that SBC will have incurred in the unlikely event that the Commission grants SBC's petition for reconsideration. Preparation of the refund plan requires that SBC compute the rates that would have been in effect had Pacific Bell's nonprimary line count been just and reasonable and determine the quantity of affected rate elements purchased by each IXC during the first six months of 1998. The first of these steps is straightforward, while the second step requires only that SBC query its billing records for the January 1, 1998 to June 30, 1998 period.

¹MCI Opposition to SBC Application for Review, CC Docket No. 97-250, filed July 14, 1998.

For this reason, the Commission should deny SBC's motion for extension of time.

Respectfully submitted,
MCI TELECOMMUNICATIONS
CORPORATION

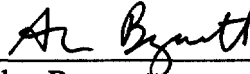
A handwritten signature in black ink, appearing to read "Alan Buzacott".

Alan Buzacott
Regulatory Analyst
1801 Pennsylvania Ave., NW
Washington, DC 20006
(202) 887-3204

August 17, 1998

STATEMENT OF VERIFICATION

I have read the foregoing, and to the best of my knowledge, information, and belief there is good ground to support it, and that it is not interposed for delay. I verify under penalty of perjury that the foregoing is true and correct. Executed on August 17, 1998.



Alan Buzacott
Regulatory Analyst
1801 Pennsylvania Ave. NW
Washington, D.C. 20006
(202) 887-3204

CERTIFICATE OF SERVICE

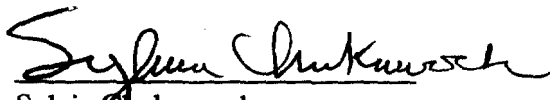
I, Sylvia Chukwuocha, do hereby certify that copies of the foregoing Opposition were sent via first class mail, postage paid, to the following on this 17th day of August, 1998.

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**HAND DELIVERED


Sylvia Chukwuocha